

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW HAMPSHIRE**

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Laurie Ortolano, :  
 :  
Plaintiff :  
 :  
 : 1:22-cv-00326-LM  
v. :  
 :  
 :  
The City of Nashua, New Hampshire, et al. :  
Defendants :

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**ASSENTED-TO MOTION TO EXTEND TIME TO FILE AN  
OBJECTION TO DEFENDANT DONCHESS'S AND GRIFFIN'S  
MOTION FOR JUDGMENT ON THE PLEADINGS**

Plaintiff Laurie Ortolano respectfully files this fully Assented-to Motion to Extend the Deadline to File an Objection to Defendant Donchess's and Griffin's Motion for Judgment on the Pleadings [Doc. No. 42] from January 25, 2023 to February 6, 2023. In support of this motion, Plaintiff states the following.

1. Defendants Donchess and Griffin filed a motion for judgment on the pleadings [Doc. No. 42] on January 11, 2023 after receiving plaintiff's assent to exceed the page limit for this document.
2. Based on the date of the original filing, Plaintiff's Objection is due on or before January 25, 2023.
3. Because of a recent health scare involving admission to the emergency room, counsel needs additional time to file a substantive response and therefore seeks an extension of twelve (12) days of this filing deadline to allow the objection to be filed by Monday, February 6, 2023.
4. The extension will not require continuation of any other pending

deadlines or hearings in this matter.

6. Defendants' counsel has kindly assented to this Motion.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Extend Plaintiff's deadline to file an objection to February 6, 2023; and
- B. Grant such further relief as justice requires.

Respectfully submitted,

**LAURIE ORTOLANO**

By her attorneys,

January 23, 2023

By: /s/ Kurt S. Olson  
Kurt S. Olson (Bar No. 12518)  
Olson & Olson, P.A.  
31 Franklin Rd.  
Salisbury, NH 03268  
603-748-1960  
[kolson@mslaw.edu](mailto:kolson@mslaw.edu)

### **CERTIFICATE OF SERVICE**

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: January 23, 2023

By: /s/ Kurt S. Olson  
Kurt S. Olson